The Hon. Robert S. Lasnik

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,	NO. CV15-143-RSL
Plaintiff,	
v.	**STIPULATION TO STAY THE UNITED STATES' OPPOSITION TO CLAIMANT JOSHUA MACKE'S MOTION FOR SUMMARY JUDGMENT**
REAL PROPERTY LOCATED AT 2731 BOYLSTON AVENUE EAST, UNIT 301, SEATTLE, WASHINGTON, KING COUNTY PARCEL NO. 638980-0050; TOGETHER WITH ITS BUILDINGS, IMPROVEMENTS, APPURTENANCES, FIXTURES, ATTACHMENTS AND EASEMENTS,	NOTE ON MOTION CALENDAR: February 7, 2017
Defendant.	

The United States and Claimant Joshua Macke (collectively, "the Parties"), by and through their undersigned counsel, have entered the following stipulation to stay the United States' Opposition to Mr. Macke's Motion for Summary Judgment. Pursuant to this stipulation, the Parties respectfully request the Court stay the deadline for the United

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1   States to file its Opposition while the Parties attempt to reach a final settlement agreement

2   in this case.

3   RELEVANT PROCEDURAL FACTS

4   Claimant Joshua Macke filed a Motion for Summary Judgment ("Motion") in this

5   case on December 14, 2016 (Dkt No. 39). The original noting date for the Motion was

6   February 3, 2017 (*Id.*). On January 9, 2017, by agreement of the Parties, Mr. Macke

7   renoted the Motion for February 17, 2017 (Dkt. No. 42). Currently, therefore, the United

8   States is required to file its Opposition to the Motion no later than February 13, 2017. *See*

9   Local Civil Rule 7(d)(3) ("Any opposition papers shall be filed and served not later than

10   the Monday before the noting date").

11   STIPULATION

12   The Parties stipulate as follows:

13   1. The Parties have reached a tentative settlement agreement in this case, but need

14   time to confer with the other Claimants, to finalize the agreement, and to commit the

15   agreement to writing. If the agreement is executed, it will dispose of the entire case and

16   will eliminate the need for further litigation, including any Opposition to or ruling on Mr.

17   Macke's Motion.

18   2. To avoid incurring additional fees, and to avoid unnecessary work on the part

19   of the Court and the Parties, the Parties agree to a stay of the deadline for the United

20   States to file its Opposition to Mr. Macke's Motion. If the Parties are unable to reach a

21   final settlement agreement, the United States will notify the Court promptly and request a

22   new noting date for its Opposition.

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Stipulation to Stay the United States' Opposition to Summary Judgment - 2
U.S. v. 2731 Boylston Avenue East, Unit 301, CV15-143-RSL

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1   DATED this ___ day of February, 2017.

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3   Respectfully submitted,

4   ANNETTE L. HAYES
5   United States Attorney

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7

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9   RICHARD E. COHEN
                                     Assistant U.S. Attorneys
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11   700 Stewart Street, Suite 5220
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17   /s Todd Maybrown*
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18   Attorney for Claimant Joshua Macke
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Stipulation to Stay the United States' Opposition to Summary Judgment - 3
U.S. v. 2731 Boylston Avenue East, Unit 301, CV15-143-RSL
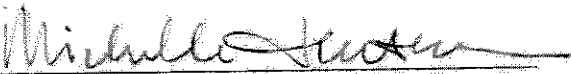
~~[PROPOSED]~~ ORDER

The Court, having reviewed the Parties' stipulation, and finding good cause, HEREBY ORDERS:

1. The deadline for the United States to file its Opposition to Joshua Macke's Summary Judgment Motion (Dkt. No. 39) is STAYED; and,

2. If the Parties are not able to reach a final settlement in this case, the United States will notify the Court promptly and propose a new deadline for its Opposition.

DATED this 8th day of February, 2017.

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ROBERT S. LASNIK
UNITED STATES DISTRICT JUDGE

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Stipulation to Stay the United States' Opposition to Summary Judgment - 4
U.S. v. 2731 Boylston Avenue East, Unit 301, CV15-143-RSL

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2   Presented by:

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5   _____
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6   RICHARD E. COHEN

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13   /s Todd Maybrown*
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    Stipulation to Stay the United States' Opposition to Summary Judgment - 5
    U.S. v. 2731 Boylston Avenue East, Unit 301, CV15-143-RSL